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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **TACOMA DIVISION**

11 WILL CO. LTD. a limited liability company
12 organized under the laws of Japan,

13 Plaintiff,

14 vs.

15 DOES 1-20, d/b/a THISAV.COM,

16 Defendants.

Case No.: 3:20-cv-05802-BHS

**DECLARATION OF JASON TUCKER
IN SUPPORT OF PLAINTIFF'S EX
PARTE MOTION FOR EARLY
DISCOVERY**

NOTE ON MOTION CALENDAR:
SEPTEMBER 10, 2020

17
18 I, Jason Tucker, under penalty of perjury, declare and state as follows:

19 1. I am a United States Citizen, over the age of 18 years old, make this declaration
20 based upon personal knowledge and, if called to testify could and would testify competently to
21 the facts set forth herein.

22
23 2. I am President of Battleship Stance Inc., a leading intellectual property
24 management and anti-piracy enforcement company. Our clients include award winning adult
25 entertainment studios.
26

DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S EX PARTE MOTION FOR EARLY
DISCOVERY
[3:20-cv-05802-BHS]

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

1 3. I have been in the business of legal adult entertainment production (both on and
2 off the Internet), marketing, and management at an executive level for over fifteen (15) years,
3 serving for over six (6) years as President of a company that owned and licensed one of the
4 world's largest libraries of erotic images.

5 4. I have served as a consultant to Fortune 100 companies including Microsoft
6 Corporation for the rollout of several versions of Windows Media and in the development and
7 roll out of their Digital Rights Management technology and Akamai Technologies among others.

8 5. As an experienced executive within the adult entertainment industry, I have been
9 featured and quoted in publications including Newsweek, BusinessWeek, USA Today, Wired,
10 and the Washington Post and frequently am requested to speak on panels and at seminars at
11 industry events on various industry related topics and trends.

12 6. I have been involved in more than fifty (50) federal lawsuits brought against a
13 range of defendants for copyright infringement and have previously served as an expert witness
14 in similar proceedings.

15 7. Will Co. Ltd. retained Battleship Stance, Inc. to investigate copyright and
16 trademark violations and assist in certain litigation to enforce its intellectual property rights,
17 including violations on ThisAV.com.

18 8. I have inspected, investigated, and researched the domain and web site
19 ThisAV.com.

20 9. The domain ThisAV.com is currently registered with GoDaddy, LLC., located
21 in Arizona and uses a company named Domains By Proxy, LLC. as a privacy service.

22 10. Currently, all registrant, administrative contact, and technical contact information
23 is redacted from public view.


11. ThisAV.com's domain name server is Cloudflare, Inc. located in California. A domain name server connects a typed in domain name with the actual IP address/location of a web site.

12. ThisAV.com is hosted at GorillaServers, Inc. located in Ogden, Utah on servers in Los Angeles, California.

13. Advertising broker Tiger Media, Inc. brokers United States ads on ThisAV.com through its U.S servers. The Tiger Media, Inc. domains Juicyads.me are hosted at and serve ads through Mojohost in Michigan, Jads.co through Mojohost in Michigan, and Juicyads.com through Stackpath, LLC in Texas.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Execute on the 10th day of September 2020 at Scottsdale, Arizona.


Jason Tucker